



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

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February 2, 2008

Dr. Roy E. Crabtree
Regional Administrator
Southeast Regional Office
National Oceanic and Atmospheric Administration
263 13th Avenue South
St. Petersburg, Florida 33701

Subject: EPA NEPA Comments on NOAA FEIS for the "Snapper Grouper Amendment 15A"; South Atlantic Fishery Management Council; South Atlantic Ocean; CEQ No. 20080023; ERP No. NOA-E91020-00

Dear Dr. Crabtree:

Consistent with our responsibilities under Section 102(2)(C) of the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the U.S. Environmental Protection Agency (EPA) has reviewed the National Oceanic and Atmospheric Administration's (NOAA) Final Environmental Impact Statement (FEIS) for Snapper Grouper Amendment 15A. The FEIS was prepared for NOAA by the South Atlantic Fishery Management Council. This amendment concerns the continued rebuilding of the overfished South Atlantic stocks of the snowy grouper (*Epinephelus niveatus*), black sea bass (*Centropristis striata*) and red porgy (*Pagrus pagrus*) by updating management reference points, modify rebuilding schedules and defining rebuilding strategies. EPA has provided NEPA comments on the Draft EIS (DEIS) for Amendment 15A in a letter dated November 9, 2007.

We appreciate the responses to our comments on the DEIS, which were provided on pages IV-VII. We have no substantive additional comments but suggest or reiterate the following:

* Ecosystem Management Approach – We agree with the proposed efforts to form a Deepwater Snapper Grouper Unit in Amendment 17 to the Snapper Grouper Fishery Management Plan (FMP). This Unit could contain several species and would manage them more like an ecosystem as opposed to a target species. Inclusion of other factors – to the extent they can be managed by NOAA – that affect these species and are affected by these species (predator-prey relationships, habitat, etc.) might also be considered as part of management under Amendment 17.

* Minimum Recovery Times – Within the constraints of species life cycles and societal issues, we again wish to emphasize our support for the promotion of fast-track strategies for stock recoveries. Such timeframes would limit harvesting during the process to minimize the number of years needed for recovery, which would benefit

the environment (fish stocks) as well as the fishers of stocks once recovered (sustainable harvest at optimum yield).

* Public Responses – We appreciate that a considerable effort was made to be responsive to the technical fishery issues presented in our DEIS comments. To the extent feasible, such responses should be made in layman's terms to facilitate the public's understanding of the proposed amendment. Inclusion of a short summary in layman's terms to supplement a more technical response may be a useful approach for future NEPA documents.

We appreciate the opportunity to review the FEIS. Should you have questions regarding these comments, feel free to contact Chris Hoberg of my staff at 404/ 562-9619 or hoberg.chris@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'H. Mueller', with a stylized, cursive script.

Heinz J. Mueller, Chief
NEPA Program Office
Office of Policy and Management

cc: Dr. Rodney F. Weiher
NEPA Coordinator
National Oceanic and Atmospheric Administration
NOAA Office of Program Planning and Integration (PPI)
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